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Counsel for Wayne Nugent, KGS Services, LLC and Nugent Holdings, LLC

## IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

In re:

SPHERATURE INVESTMENTS LLC, 
et al., 
Debtors.

SPHERATURE INVESTMENTS LLC, 
SPHERATURE STMENTS LLC, 
SPHERATURE

## **NOTICE OF APPEARANCE**

PLEASE TAKE NOTICE that the undersigned hereby appear as counsel for Wayne Nugent, KGS Services, LLC and Nugent Holdings, LLC and pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, and 9010 and 11 U.S.C. § 1109(b), request that copies of any and all notices, pleadings, motions, orders to show cause, applications,

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<sup>&</sup>lt;sup>1</sup> The "Debtors" in the above-captioned jointly administered chapter 11 bankruptcy cases are: Spherature Investments LLC; Rovia, LLC; WorldVentures Marketing Holdings, LLC; WorldVentures Marketplace, LLC; WorldVentures Marketing, LLC; WorldVentures Services, LLC.

presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statements and plans of reorganization, or other documents, filed or entered in this case, be transmitted to:

Ryan E. Manns (SBT 24041391) NORTON ROSE FULBRIGHT US LLP 2200 Ross Avenue, Suite 3600 Dallas, Texas 75201-7932 Telephone: (214) 855-8000 Facsimile: (214) 855-8200

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PLEASE TAKE FURTHER NOTICE that, in accordance with Federal Rule of Bankruptcy Procedure 3017(a), this request also constitutes a request in writing for copies of any and all disclosure statements or plans filed in these cases.

Neither this Request for Notice nor any subsequent appearances, pleadings, claims, proofs of claim, documents, suits, motions nor any other writings or conduct, shall constitute a waiver of either of such parties':

- a. right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge;
- b. right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private right, or in any case, controversy or proceeding related hereto, notwithstanding the designation *vel non* of such matters as "core proceedings" pursuant to 28 U.S.C. § 157 (b)(2)(H), and whether or not such jury trial right is pursuant to statute or the United States Constitution;
- c. right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. other rights, claims, actions, defenses, setoffs, recoupments or other matters to which Mr. Nugent is rightly entitled under any agreements or at law or in

equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: October 11, 2021 Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ Ryan E. Manns

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## **CERTIFICATE OF SERVICE**

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Notice of Appearance was served upon the counsel and parties of record, electronically through the Bankruptcy Court's Electronic Case Filing System on those parties that have consented to such service, on the 11<sup>th</sup> day of October, 2021.

/s/ Ryan E. Manns Ryan E. Manns

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